

July 17, 2006

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington DC 20580

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. While I applaud the intention of the Commission to provide greater protection to consumers, certain proposals actually take away some of the benefits of owning a home based business and open the door to a myriad of other challenges. I believe that in its presented form, it could prevent me from continuing as a business owner in the Quixtar business and destroy the businesses of tens of thousands, of other IBO's.

One of the most challenging sections of the proposed rule is the seven day waiting period to enroll a new Quixtar IBO. This waiting period will give the prospect the idea that there's something wrong with our plan and also reflects badly on other IBO's and the FTC, as well. I also think this seven-day waiting period is unnecessary, because Quixtar already has a 100% 1 year money back guarantee policy. This waiting period requirement will also require additional detailed record keeping which will take away from the simplicity that makes this a viable income opportunity for millions of Americans. Furthermore, sending in reports to the corporation adds additional time and costs to both myself and the company, further decreasing profits or otherwise forcing additional mark up into the product to cover the expenses. This is a burden on the IBO as well as the consumer. Please realize we are small business owners, with limited capital.

I find other proposed requirements to be grossly unfair to us, also. Requiring a business owner to disclose the number of cancellation or refund requests received in the last two years is not an accurate measure of an opportunity's legitimacy or success possibility. There are a number of reasons people cancel their enrollment and fraud is probably the lowest reason. The majority are traditional buyer's remorse and from the urging of uninformed outside interests such as friends and relatives. Somebody's Uncle Louie who had a bad experience, quite possibly because of his own inability to follow a proven system, should not be permitted to cast a shadow over what an IBO offers a prospect. Do Subway, McDonalds and other franchise applicants get a list of all recent legal decisions against their franchise? How many traditional companies that hire independent sales reps are required to disclose how many customers sent their product back for a refund? Where does a newly enrolled Independent Business Owner get the required number of references for his or her first prospect? Which ones do you think the company will

provide them with? The most successful ones of course – so what is the point of doing it at all?

Finally, a proposed rule requires the disclosure of a certain number of new IBO's nearest to the prospect. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of other individuals to strangers. Prospects may be subject to sexual or racial harassment, for instance. Additionally this could result in the release of names of business associates to individuals attempting to obtain names for other fraudulent purposes such as their own prospecting efforts weakening the entire providing company's foundation.

In closing, I fear enacting these proposals will do little to stop the unethical people who attempt to legitimize their scams under the guise of a home business or MLM business opportunity. Yes there are scams that are out in the marketplace, but it is up to the buyer to conduct the necessary due diligence to make an informed decision. For legitimate successful opportunities, good FTC approved information is readily available. Therefore, in a free enterprise system, I don't feel it's appropriate for the government to penalize legitimate opportunities, in order to stop the scam artists.

Thank you for your time in this matter.

Best regards,

Kenneth J Lange

Quixtar IBO